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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 Rudy Rivera, an individual,

12 Plaintiff,

13 v.

14 United States of America,

15 Defendant.

Case No: 2:19-cv-00306-RFB-VCF

Motion for Extension of Time

(First Request)

16 Defendant United States respectfully moves for a 15-day extension of time, from
17 April 22, 2019 to May 7, 2019, to file a response to Plaintiff's Complaint (ECF No. 1). This
18 is the first request for an extension of time.

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MEMORANDUM OF POINTS AND AUTHORITIES

22 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request
23 additional time to perform an act. In this case, the United States requests additional time to
24 file a response to the Complaint for the reasons set forth below.

25 Defense counsel has had to devote time to a number of other matters including a
26 summary judgment reply brief in *Nitta v. United States*, 2:17-cv-01137-GMN-CWH, filed
27 earlier this month, as well as two responses (including a motion) to complaints due April 22,
28 2019 in *Lawrence, et al. v. Las Vegas Metropolitan Police Department, et al.*, 2:16-cv-03039-RFB-

1 NJK. Counsel had to travel for out of state depositions in March and April, he was out of
2 the office on several occasions during the last two weeks due to a family matter, and he must
3 travel next week for an out of state deposition. The Civil Division of the U.S. Attorney's
4 Office remains understaffed in both AUSA and support staff positions. This extension of
5 time is requested to allow undersigned counsel adequate time to review relevant materials
6 and prepare a response to the Complaint in this matter. This motion is filed in good faith and
7 not for the purposes of undue delay.

8 For the above reasons, the United States respectfully requests this extension of time,
9 from April 22, 2019 to May 7, 2019, to file a response to Plaintiff's Complaint.

10 Respectfully submitted this 22nd day of April 2019.

11 NICHOLAS A. TRUTANICH
12 United States Attorney

13 s/ Patrick A. Rose
14 PATRICK A. ROSE
Assistant United States Attorney

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16 ORDER

17 IT IS SO ORDERED.

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19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE

21 Date: April 23, 2019.

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